## BEFORE THE FEDERAL MARITIME COMMISSION

	.)
BALTIC AUTO SHIPPING, INC.	)
COMPLAINANT,	) ) )
v,	)
	) DOCKET NO. 14-16 )
MICHAEL HITRINOV a/k/a MICHAEL KHITRINOV, EMPIRE UNITED LINES CO., INC.,	) ) ) )
RESPONDENTS.	) )

RESPONDENTS' MOTION FOR PARTIAL SUMMARY DECISION DISMISSING COMPLAINT FOR REPARATIONS ON THE BASIS OF (1) THE CLAIM IS BARRED BY THE STATUTE OF LIMITATIONS; AND (2) THE CLAIM IS BARRED BY THE SETTLEMENT AGREEMENT AND RELEASE

The Respondents Michael Hitrinov and Empire United Lines Co., Inc., by and through their attorneys, The Law Office of Doyle & Doyle, hereby move for an Order granting partial summary decision to dismiss the Complaint of Complainant Baltic Auto Shipping, Inc. for reparations under 46 USC 41301 (a). This Motion is supported by the accompanying Memorandum and Appendix Exhibits attached thereto, which include the Certification of Respondent Michael Hitrinov. A proposed Order is filed herewith.

Dated this 23rd day of March 2015

THE LAW OFFICE OF DOYLE & DOYLE Attorneys for Respondents

Gerard S. Doyle, Jr.

636 Morris Turnpike Short Hills, NJ 07078 Tel: 973-467-4433

Fax: 973-467-1199

Email: gdoyle@doylelaw.net

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the RESPONDENTS' MOTION FOR PARTIAL SUMMARY DECISION DISMISSING COMPLAINT FOR REPARATIONS ON THE BASIS OF (1) THE CLAIM IS BARRED BY THE STATUTE OF LIMITATIONS; AND (2) THE CLAIM IS BARRED BY THE SETTLEMENT AGREEMENT AND RELEASE and APPENDIX upon Complainant's counsel, Marcus A. Nussbaum, Esq., with the address of P.O. Box 245599, Brooklyn, NY 11224 by first class mail, postage prepaid, by fax (347-572-0439) and by email (marcus.nussbaum@gmail.com); and that the original and five (5) copies are being filed with the Secretary of the Federal Maritime Commission.

Gerard S. Doyle, Jr.

THE LAW OFFICE OF DOYLE & DOYLE

636 Morris Turnpike
Short Hills, NJ 07078
973-467-4433 (Telephone)
973-467-1199 (Facsimile)
gdoyle@doylelaw.net
Attorneys for Respondents
Michael Hitrinov, a/k/a
Michael Khitrinov, and
Empire United Lines, Co., Inc.

Dated in Short Hills, NJ this 23rd day of March, 2015.